

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC,  Debtors.	Chapter 11  Bankruptcy Case No. 20-10343 (LLS) (Jointly Administered)
NATIONAL UNION FIRE INSURANCE CO. OF PITTSBURGH, PA, et al.,  Appellants,  v.  BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, Appellees.	Case No. 22-cv-01237-RGA

**NOTICE OF ERRATA RE: EMERGENCY MOTION OF LUJAN CLAIMANTS  
FOR STAY PENDING APPEAL AND A TEMPORARY STAY  
WHILE THE COURT RULES ON THE MOTION; JOINDER**

Lujan Claimants hereby provide notice of the following errors contained in the Emergency Motion of Lujan Claimants for Stay Pending Appeal and a Temporary Stay While the Court Rules on the Motion; Joinder [D.I. 156]:

1. On page 3, lines 1-2, it mistakenly states “Certain Insurers,” but should state “Lujan Claimants.” With the correction, the corrected sentence reads: “Even if this Court is satisfied that it has correctly determined the issues, a reasonable possibility exists that the Third Circuit—which has repeatedly cautioned against the danger posed by mass tort

bankruptcies—may disagree on one or more issues the Lujan Claimants or other appellants will raise on appeal.”

2. On page 6, paragraph 6, line 5, it mistakenly states “Brian Bates,” but should state “Charles Bates.” With the correction, the corrected sentence reads: “Further, the valuation by Dr. Charles Bates of the aggregate value of Survivors’ claims included a 90% value reduction of single-victim claims even though the starting point for valuing claims under the TDP is single-victim perpetrator and that multiple victims is an aggravating factor that increases claim values.”

Dated: Wilmington, Delaware

Respectfully Submitted,

April 5, 2023

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